# Redrambler Limited

# ACADEMY INTERNAL AUDIT 2021/22

# HILBRE HIGH SCHOOL

First remote visit – 17th November 2021 – sections B and G

Second remote visit – 20th June 2022 – section J

Third remote visit – 20th June 2022 – section L

Report of internal audit following the SECOND day **which was carried out remotely** on the **20th June 2022** conducted by Iain Blair and reviewed by Paula Bailey.

Report of internal audit following the THIRD day **which was carried out remotely** on the **20th June 2022** conducted by Jackie Byrne and reviewed by Iain Blair.

The audit report below should be read in detail paying attention to the comments and risk on each individual item, *1 is high risk, 5 is low risk.* Items without a grade have not been tested.  A summary sheet is provided for reference at the front of this report.

Internal control, no matter how well designed and operated, can provide only reasonable, and not absolute assurance regarding the achievement of the guidelines in the Academy Trust Handbook (ATH) 2021.  The likelihood of achievement is affected by limitations inherent in all internal control systems.  These include the possibility of poor judgement in decision-making, human error, control processes being deliberately circumnavigated by employees, management overriding controls and the occurrence of unforeseeable circumstances.  Redrambler Limited aims to provide proactive advice, identify good practice and highlight any systems weaknesses for management consideration in a format that is clear and easy to understand.  We have planned our work, **which we have adapted to be conducted remotely during the COVID-19 pandemic**, to give a reasonable expectation of detecting significant control weaknesses.  However, internal audit procedures alone, even when carried out with due professional care, cannot ensure fraud will be detected.

There are no items of an urgent nature to bring to the attention of the Academy.
The overall risk is graded as **LOW**

Redrambler Limited would like to thank the staff for their cooperation and support during the remote Internal Audit of the Academy.

**Redrambler Limited**
30th June 2022

## Summary information

| | |
|---|---|
| Name of Academy | Hilbre High School |
| Address including postcode | Frankby Road, West Kirby, Wirral, CH48 6EQ |
| NOR | 1,168 (1002 in 7-11 and 165 in 6th form) |
| Capacity | 1,210 (1000 in 7-11 and 210 in 6th form) |
| % over/undersubscribed | Fully subscribed in years 7-11       79% undersubscribed (sixth form) |
| MAT or standalone | Standalone |
| Principal & Accounting Officer | Mark Bellamy |
| Chair of Governors | Mike Cockburn |
| Chair of Finance/Audit Committee | Sian Turner |
| School Business Manager | Jane Doyle |
| Senior Finance Manager | Amanda Duckers |
| Auditors | Crowe UK LLP |
| Latest Ofsted inspection and category | October 2021 – Good |
| Accounts package | Civica |
| Payroll provider (or in house) | Wirral LA (out to tender at the moment) |
| MIS | Sims |

## Summary Table of available sections

| Section | Description | No of Items | Audit – remote 17.11.2021 | | | Audit – remote 20.6.22 | | | Audit – remote 20.6.22 | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | No Tested | Highest grade | Lowest grade | No Tested | Highest grade | Lowest grade | No Tested | Highest grade | Lowest grade |
| A | Governance Review | 37 | | | | | | | | | |
| B | Budget Planning, Monitoring and Reporting | 20 | 17 | 5 | 3 | | | | | | |
| C | Purchasing | 12 | | | | | | | | | |
| D | Income | 22 | | | | | | | | | |
| E | Payroll and HR | 14 | | | | | | | | | |
| F | Cash flow and VAT | 11 | | | | | | | | | |
| G | Risk Management | 14 | 14 | 5 | 3 | | | | | | |
| H | Premises Management | 26 | | | | | | | | | |
| J | Cyber Security | 40 | | | | 39 | 5 | 2 | | | |
| K | Single Central Record | 16 | | | | | | | | | |
| L | Website compliance | 33 | | | | | | | 31 | 5 | 3 |
| M | GDPR compliance | 43 | | | | | | | | | |
| | **Overall** | **288** | **31** | **5** | **3** | **39** | **5** | **2** | **31** | **5** | **3** |

| B | BUDGET PLANNING, MONITORING AND REPORTING | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| | Review through sample checks and discussions the procedures used to prepare financial reports issued to governors and officers of the Academy to be satisfied that they are completed accurately and promptly.  Are the following expectations met? | | | | |
| B1 | The trustees meet at least three times a year, receive information on financial performance with minutes evidencing discussions, and only when meetings are quorate (ATH 2.3) | The Finance committee meets 3 times a year, once a term.  Minutes were made available for the 3 meetings in the last academic year.  Governors receive detailed information on financial performance and minutes are of a high standard evidencing discussion. | 5 | | |
| B2 | Has the board of trustees approved a balanced budget and is this decision recoded in the minutes? (ATH 2.10) | The budget was approved by the finance committee on 14th June 2021 (minutes seen).<br>It was ratified by the Full Board on 12TH July 2021 (minutes seen). | 5 | | |
| B3 | Did the academy trust submit the Budget Forecast Return Outturn (BFRO) by the deadline in May? (ATH2.15)<br>Was this approved by trustees before submission? (ATH 2.16) | Not required last academic year | N/A | | |
| B4 | Did the academy trust submit the 3 Year Budget Forecast Return by the deadline in July? (ATH 2.15)<br>Was this approved by trustees before submission (ATH 2.16) | The Senior Finance Manager confirmed the 3 Year Budget Forecast Return was submitted by the deadline.  Although the budget was approved the actual 3 Year Budget Forecast Return was not<br><br>**We recommend these returns are approved by trustees before submission as per ATH 2.16.** | 3 | | |

| B | BUDGET PLANNING, MONITORING AND REPORTING | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| B5 | Are management reports (e.g. for SLT and budget holders) prepared monthly?  Are they shared with the chair of trustees every month and with other trustees at least 6 times a year? (ATH 2.18) | Management reports are prepared by the Senior Finance Manager every month. They are shared with all trustees 6 times a year. They are shared with the Chair, all finance committee members, the Headteacher and SBM every month.<br><br>In September and October the income and expenditure report with variation to budget was not available.  This is because the budget had not been entered onto the Civica finance system.<br><br>**We recommend the budget, which was approved by the Finance Committee and ratified by the Trust Board in July, is entered onto the finance system at the start of the financial year in September to ensure management reports are available for governors and senior staff every month.** | 3 | | |

| B | BUDGET PLANNING, MONITORING AND REPORTING | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| B6 | Are reports extracted from or reconciled to accounting package and include all relevant areas of income/expenditure. Is there evidence for trustees that balances on management reports equal balances on accounting package? | Reports are extracted from the accounting package, Civica. An income and expenditure report is made available with the management accounts to evidence balances. The accounts for period 12 were made available for review. There was a discrepancy between the balance on the Civica I&E report (£68,373) and the balance on the management accounts (£57,345). The Senior Finance Manager explained it was due to accrued income for Apprentice Income which had since been reversed. **We recommend the figures that should balance on the management accounts and the reports from Civica are highlighted. This will make it easier for governors to understand what they should be checking and to gain assurance on the accuracy of the management accounts.** | 3 | | |
| B7 | Do reports include a forecasted out-turn figure for the financial year end (i.e. this forecasted out-turn figure should include all commitments). | The income and expenditure report includes a column for a forecasted out-turn figure. The Senior Finance Manager confirms she updates this every month. | 5 | | |

| B | BUDGET PLANNING, MONITORING AND REPORTING | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| B8 | Reports are in a format that is:<br>• Relevant to role of recipient(s)<br>• Clearly presented so that information is easy to understand<br>• Provided in advance of meetings | Reports are relevant, clearly presented, provided on a timely basis and in advance of meetings. | 5 | | |
| B9 | Do reports include income and expenditure report, variation to budget, cash flow and balance sheet? (ATH 2.21).<br>Is an Aged Debtor Report and Aged Creditor Report provided?  Whilst they are not a specific requirement they complement the cash flow and balance sheet reports. | Reports include all these.<br>An Aged Debtor and Aged Creditor Report is not provided however they are reconciled during the month end process and signed off by the Business Manager.<br><br>**Consideration could be given to including these.** | 4 | | |
| B10 | To ensure accountability have variances since last report been identified and explained with an assessment of implications for current and longer term plans? (ATH 2.20) | Variances are identified and an explanation is given in the notes of the income and expenditure report. There are further discussions in the finance committee meetings which are clearly minuted. | 5 | | |
| B11 | After the report has been produced is the accounting period closed on the finance system?  If not, why not? | The Senior Finance Manager confirmed she closes the period and rolls it into the new month. | 5 | | |
| B12 | Does the organisation have a clear budget forecast for the next three years, which identifies spending opportunities, risks and any major strategic issues being addressed? Does it detail how these will be mitigated? (ATH 2.11) | The Business Manager has responsibility for the 3 year budget.  She confirmed she is updating it constantly particularly on the staffing figures as recruitment is still underway.  The 3 year budget is reviewed and checked by the Headteacher. | 5 | | |

| B | BUDGET PLANNING, MONITORING AND REPORTING | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| B13 | Does the organisation have sufficient reserves to cover major changes such as re-structuring, and any risks identified in the budget forecast? | The academy has set a balanced budget this year and has adequate reserves if needed.  The budget is also balanced for the following year.  The year after it is showing a deficit although the reserves will cover this in the short term.<br><br>**We recommend the 3 year budget continues to be kept up to date to monitor the risk of setting a deficit budget in 2023/24.** | 4 | | |
| B14 | In a deficit budget position, have realistic deficit recovery plans been agreed with the EFA? (ATH 2.17) | N/A | N/A | | |
| B15 | Is the School Development Plan linked with the Budget and is it affordable? | The School Development Plan (SDP) was made available and has a Resources column in.  The School Business Manager confirmed that the SDP is compiled with input from every member of SLT and the contents of the plan directs the budget for the year and are intrinsically linked. | 5 | | |
| B16 | Does the academy take an integrated approach to curriculum and financial planning (ICFP)? (ATH 2.13) | The Trust Board minutes 15.3.21 evidence that a comprehensive piece of work has been undertaken by the Deputy Headteacher, supported by the Business Manager.  This has resulted in staffing issues being highlighted and a redundancy in a department. | 5 | | |

| B | BUDGET PLANNING, MONITORING AND REPORTING | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| B17 | Do the 3 key staff involved in ICFP work together throughout the year:-<br>- Person responsible for timetabling<br>- Person responsible for curriculum<br>- Finance Director or equivalent | The Deputy Head is responsible for timetabling and curriculum.  The School Business Manager confirmed that they work together on this throughout year and have plans to present information to governors moving forward. | 5 | | |
| B18 | Is there an investment policy which is in line with the requirements in section 2.25 of the ATH?   Has it been applied for any substantial surplus? | There is a Capital Reserves and Investment Policy which was made available.  It was last approved in November 2020 and ratified in December 2020.  It hasn't been applied for any surplus as interest rates are currently very low. | 5 | | |
| B19 | In the case of a MAT is there an appeals mechanism regarding arrangements for any pooling of GAG into a central fund (ATH 5.31)? | N/A | N/A | | |
| B20 | Is there evidence that pupil numbers used for funding are accurate (ATH 3.14 )? | The Data Manager completes the census and it is signed off by the Headteacher.  Pupil data is maintained in Sims. | 5 | | |

| G | RISK MANAGEMENT | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| | In accordance with ATH 2.38 has the trust prepared a register of risks showing: | | | | |
| G1 | - An assessment of the likelihood and materiality of risk | The Risk Reduction Plan for 2021-22 was made available. There is an assessment of the likelihood and impact of the risk. | 5 | | |
| G2 | - How risks are managed or mitigated | There are control procedures with a target date, person responsible and review date in the plan. | 5 | | |
| G3 | - Evidence of any financial risks on the risk register informing the internal audit programme? | There are a number of financial risks which have informed the internal audit programme (for example fraud and reconciliation risk) | 5 | | |
| G4 | Does the trust board review the risk register at least annually (ATH 2.38)? | The SBM confirmed that risk is frequently discussed in SLT and governor meetings. This is evidenced in governor meeting minutes that were made available. However the risk register was not reviewed in the last academic year.<br><br>**We recommend the risk register is reviewed at least annually by the Trust Board in accordance with ATH 2.38.** | 3 | | |
| | Has the trust current insurance cover (ATH 2.40) for the following: | | | | |
| G5 | - Buildings and contents | The Senior Finance Manager advised the PFI company insure the building.<br>Material damage is covered by Zurich Insurance, renewal date 1.9.22. | 5 | | |
| G6 | - Public liability | Zurich Insurance, renewal date 1.9.22 | 5 | | |

| G | RISK MANAGEMENT | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| G7 | - Employer Liability | Zurich Insurance, renewal date 1.9.22. The Employers Liability certificate is displayed in the staff room (not seen as working remotely). | 5 | | |
| G8 | - Vehicle (if appropriate) | There are 3 mini bus policies with QBE through Marsh Limited.  Renewal date 31.8.22. | 5 | | |
| G9 | - Cyber Insurance | The academy is having a Cyber Audit and after they have passed the audit will take out insurance through the Risk Protection Arrangement (RPA).<br><br>**We recommend the academy takes out the Cyber Insurance with the RPA asap.** | 4 | | |
| G10 | Is there a whistle blowing policy with appropriate arrangements to make it available to new staff and trustees (ATH 2.43)? Is the whistle blowing policy published on the trust website (ATH 2.44)? | There is a Whistleblowing Policy which was up to date. It is made available to staff on the shared area of the website.  If there are staff that cannot access the shared area, for example cleaners or catering staff, **we recommend a printed copy of the policy is displayed in a communal staff area.**<br><br>The whistle blowing policy is now published on the trust website. | 4 | | |
| G11 | Has the trust appointed at least one trustee and one member of staff who other staff can contact to report concerns (ATH 2.45) and is this included in the whistle blowing policy? | The policy states the member of staff with a concern should raise it with their line manager or the Headteacher.<br><br>**We recommend this is clarified further when it is next reviewed in September 2022 to ensure compliance with ATH 2.45.** | 3 | | |

| G | RISK MANAGEMENT | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| G12 | Is there a contingency and business continuity plan setting out what it would do to ensure continued operation (ATH 2.39)? | There is a School Emergency Management Plan and School Lockdown Procedures document.<br>There is also a Business Continuity Plan.<br>These are both currently under development and are due to be reviewed and approved by Trustees during the autumn term.<br><br>**We recommend these are formally approved by Trustees in accordance with ATH 2.39.** | 3 | | |
| G13 | Do minutes evidence the audit committee has agreed a programme of work to address risks to internal financial control? | The audit committee is combined with the finance committee. Minutes evidence that the committee is addressing internal controls. For example the minutes 14.6.22 detail the recent Health and Safety audit that has been undertaken. | 5 | | |
| G14 | Do minutes and reports to the committee show that matters identified in previous internal and external audit reports have been considered by the committee in a timely manner and acted upon? (ATH 3.12) | Minutes are of a high standard and show that matters from previous meetings are followed up and considered in a timely manner. | 5 | | |

| J | CYBER SECURITY | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| **Organisation** | | | | | |
| J1 | Who are the main ICT providers and how much is done in house? | The onsite technician is Stuart Purvis who is employed by the school.<br>Further network management and IT support is provided by Hi-impact Consultancy. | | 5 | |
| J2 | Who is the trust leader responsible for the management of ICT? | Paul Lloyd, Deputy Headteacher, is the trust lead on ICT. | | 5 | |
| J3 | Which trustee is the lead trustee on ICT? | Laura Ashman is the trustee lead on ICT. | | 5 | |
| J4 | Is there an ICT leader at each trust site? | There is only one site as Hilbre is a standalone academy. | | N/A | |
| J5 | Are the school's ICT services internal or by an outside contractor? Name the contractors | IT support is in house, Stuart Purvis.<br>The external support is provided by Hi-impact Consultancy, Innovation House, Power Rd, Bromborough, Birkenhead, Wirral CH62 3QT<br>Phone: 0151 638 6283<br>Website: www.hi-impact.co.uk | | 5 | |
| J6 | Are external providers listed in the school's business continuity plan? | The external support provider Hi-impact is not listed in business continuity plan, nor are other ICT providers listed e.g. SIMS or the Accounts package CIVICA<br><br>**We recommend that the ICT external providers are listed in the business continuity plan together with their contact details.** | | 2 | |

| J | CYBER SECURITY | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| J7 | If the school has an external contractor, how have they been appointed and what checks have taken place to ensure that adhere to cyber security best practices? | Hi-Impact are the external contractor who were appointed following the trust's procedures for tendering. It is clear from the SLA that they apply cyber security best practice. | | 5 | |
| J8 | How are users made aware of their role in cyber security? | The trust has just completed a cyber essentials qualification.<br>Hi-impact also has strict cyber security standards and a cyber security policy which the school abide by. The school has a copy of this. | | 5 | |
| J9 | How are trustees made aware of their role in cyber security? | **We recommend that trustees sign annually an ICT acceptable use agreement. See J11** | | 3 | |
| J10 | What training do staff receive in respect of cyber security, and how often?<br>When was the last training delivered? | New staff have a half hour briefing with Stuart Purvis. There are regular updates sent out via emails to the trust.<br><br>**We recommend there should be some formal briefing to all staff at the September inset day.** | | 3 | |

| J | CYBER SECURITY | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| J11 | Are there policies in place which cover acceptable and secure use of school systems? | Not a formal policy but briefings and other means update staff on this.<br><br>**We recommend that pupils, staff, and trustees sign annually an ICT acceptable use agreement. This could be an online form.**<br><br>**A list of signatures should be kept to ensure tracking on non-completion.** | | 3 | |
| J12 | Is cyber security a regular agenda item on trustee meetings? | No.<br><br>**We recommend that cyber security is on the agenda at every meeting even if nothing to report, this gives the opportunity for trustees to ask or say something.** | | 3 | |
| J13 | Is cyber risk considered in the trust's risk register? | The following are considered in the trust's risk register: -<br>Technology risk - Information security risk/ Data breach/Virus Risk/ Systems un-supported or lost, cyber fraud<br>Cyber Fraud Risk - IT Data and Finance systems put at risk from hacking and misuse, fraudulent acquisition of funds etc. | | 5 | |

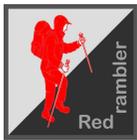| J | CYBER SECURITY | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| J14 | Is cyber risk considered in the trust's business continuity plans?<br><br>What procedures are in place for incident response and disaster? | Loss of data and e-security are considered in the business continuity plan.<br>Data and E-Security Breach Prevention and Management Plan. | | 5 | |
| J15 | Is cyber risk considered in the trust's ICT policies? | A written policy needs to be needs prepared, but staff are aware of the procedures. Trustees do not have trust email accounts.<br><br>**We recommend that a written ICT policy is prepared and approved by trustees and that trustees have trust email accounts.** | | 3 | |
| **Restoration/Backup** | | | | | |
| J16 | What procedures are in place for backup of the school systems? | The backup procedures are comprehensive see details below in J17 | | 5 | |
| J17 | How often does this backup take place? | 3 levels – Cloud backup nightly, full server every night to the backup server, local backups at 7am and 12 noon daily stored for 30 days, cold storage offsite monthly | | 5 | |
| J18 | Is the restoration of backups practised? If so, how often? What was the date of the last test restoration and was it successful? | Backup and security systems are subject to regular checks. Backup systems are configured with notifications, as is the SAN storage, in addition to manual checks. | | 5 | |
| **Network security** | | | | | |

| J | CYBER SECURITY | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|----------------|----------|-----------|-----------|-----------|
| J19 | Is the network protected from attack? | Protected by Panda 360 antivirus software – see J21 for details. | | 5 | |
| J20 | What mechanisms do you have in place for filtering, monitoring and testing of security controls? | Alerts are generated if there are incidents | | 5 | |
| **Malware prevention** | | | | | |

| J | CYBER SECURITY | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| J21 | Are anti-malware defences installed across the organisation? List the defences used. | Malware protection is Panda 360 antivirus with full features. The features include:<br>• Personal or managed firewall. IDS.<br>• Device control.<br>• Permanent multivector antimalware & on-demand scan.<br>• Managed blacklisting/whitelisting.<br>• Collective Intelligence.<br>• Pre-execution heuristics.<br>• URL filtering - web browsing.<br>• Antispam & Antiphishing.<br>• Anti-tampering.<br>• Email content filtering.<br>• Remediation and rollback.<br>• EDR: Continuous endpoint monitoring.<br>• Prevention of the execution of unknown processes.<br>• Cloud-based machine learning to classify 100% of processes (APTs, ransomware, Rootkits, etc.)<br>• Sandboxing in real environments.<br>• Behavioural analysis and detection of IoAs (Indicators of Attack) such as scripts, macros, etc.<br>• Automatic detection and response for targeted attacks and in-memory exploits<br>• Threat Hunting and forensic analysis. | | 5 | |
| J22 | How are these monitored, tested and updated? | Alerts if there are incidents | | 5 | |

| J | CYBER SECURITY | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| **Removable media** | | | | | |
| J23 | Does the school use removable media? If so, is there a policy which controls all access and use? | USB pen drives can only be used for storage, uploading has to come be done by ICT Manager. | | 5 | |
| **Secure configuration** | | | | | |
| J24 | Are security patches applied to all systems? | The trust use a WSUS server to provide Windows updates and devices have recently been audited as part of the Cyber Essentials qualification. Any devices with unsafe operating systems on school or personal devices have been removed from the network.

There are regularly patches applied via monitor software through the remote software (Datto RMM).

All third party devices on site such as the Linux servers and routers are regularly patched and maintained by the relative third parties. This has recently been clarified with them as part of our Cyber Security qualification. | | 5 | |
| J25 | How is the secure configuration maintained? | Panda patch management programme windows etc. | | 5 | |
| J26 | Is there a system inventory and baseline build for all devices? | Standard build across all the trust's devices. There are variances on the top end of the build according to the users group. E.g. pupils, teachers, SLT, Finance, HR etc. | | 5 | |
| **User privileges** | | | | | |

| J | CYBER SECURITY | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| J27 | What system is used for the management/limitation of user privileges? | Windows active directory; no written policy.<br><br>**We recommend a written policy is prepared and approved by trustees.** | | 3 | |
| J28 | How is user activity monitored? | No live active monitoring is conducted by the IT Manager but the software does continually monitor and alerts are raised. | | 5 | |
| J29 | Are audit logs kept? | Only windows server logs. | | 5 | |
| J30 | What procedures are in place to investigate any concerns regarding user activity? | If made aware Stuart will investigate, the user area and email.<br>Done with HT approval and a witness in SP office whilst investigating. | | 5 | |
| **Incident management** | | | | | |
| J31 | How is this plan tested? | Work on GDPR in the trust has helped understand the safeguarding aspects. | | 5 | |
| J32 | How are criminal incidents reported to the police? | Through senior management, safeguarding and the head and lead trustee | | 5 | |
| J33 | Have staff received any specialist training? | Safeguarding training has delivered to staff. | | 5 | |
| **Home & mobile working** | | | | | |
| J34 | Does the trust have a mobile/home working policy? | No policy. All staff school laptops must login to the school systems.<br><br>**We recommend a remote working policy should be written and approved.** | | 3 | |

| J | CYBER SECURITY | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| J35 | Are staff trained to adhere to this policy? | No written policy, when **it is prepared staff will require training.** | | 4 | |
| J36 | Is the secure baseline build applied to all devices, how is this evidenced? | Standard secure baseline builds are applied to all devices. | | 5 | |
| J37 | How are devices protected in transit and at rest when they are off school premises? | There is a password policy and sensitive data is not stored on laptops.<br>The Covid DFE devices for students had security already built in. | | 5 | |
| **Insurance** | | | | | |
| J38 | Does the trust have cyber insurance? Detail the insurance and the provider. | The trust has basic cyber insurance cover for 2022 for £25k which was acquired as part of the cyber essentials qualification. Certificate seen by us.<br><br>**We recommend the trust consider RPA insurance which will include cyber cover from September a no extra cost bit there conditions. Given the trust have certificate in J39 you should meet those conditions.** | | 4 | |
| J39 | Is the trust aware of the Cyber Essentials Programme? If so, has the trust obtained either of the level of certifications available - Cyber Essentials or Cyber Essentials Plus? | The trust has recently been awarded the Cyber Essentials certificate. We have seen the certificate. | | 5 | |

| J | CYBER SECURITY | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| J40 | **Human Risk Consideration**<br>Humans are a greater risk than software and machines are.  Humans can open the door to risk if they do not follow procedures.<br>Are the trust's procedures and training adequate to reduce the human risk? | The IT Manager considers that there needs to be more training for staff to reduce the human risk.<br><br>**We have identified several areas where written policies need to be prepared and approved, further training would be beneficial.** | | 3 | |

| L | WEBSITE TO ENSURE COMPLIANCE | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| **Website Address** | | https://www.hilbre.wirral.sch.uk | | | |
| **Check the school website includes the following sections in line with Department for Education guidance.** | | | | | |
| L1 | • Name of school<br>• Postal address<br>• Telephone number<br>• Name of the member of staff who deals with queries from parents and other members of the public<br>• Who to contact to request a paper copy of the information on your website<br>• Address and telephone number of Academy Sponsor or Academy Trust Head office<br>• Name of headteacher or principal<br>• Name and address of the Chair of the Governing Body<br>• Name and contact details of special educational needs co-ordinator (SENCO) | The name of school, address, phone number is all clearly displayed.<br>The Contact Us menu option just links to an Enquiry Form. On the home page, at the bottom, there is a Contact Us highlighted in red – this has details of who to contact with links to the Enquiry Form (see L30 for further comment on this).<br>**We recommend this Contact Us area is reviewed (see L30 for further comment on this).**<br>We sent a 'contact' message to Amanda Duckers on the morning of the internal audit. I emailed Amanda the following day as I hadn't received a reply and Amanda advised she hadn't received the message.<br>**We recommend the contact messaging system is checked to ensure it is working.**<br>We could not see who to contact specifically for a paper copy but there is a contact for general school enquiries.<br>NOTE – We found the paper copy request in 'Information' during the audit.<br>**We recommend who to request a paper copy from is included near the contact details.**<br>The Senco contact details are clearly displayed.<br>There is a Welcome message from the Headteacher on the Home page with contact details in the Contact Us section.<br>The Chair of Governors can be found in About Us / Trustees with contact details. | | | 3 |

| L | WEBSITE TO ENSURE COMPLIANCE | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
|---|---|---|---|---|---|
| L2 | Is there a statement of the school's ethos, aims and values? | In About Us/ Vision and Values. | | | 5 |
| L3 | Are the admissions arrangements published (they must be there for the whole year)? Is the policy available? Is the application process clear? Are there details of selection criteria? Are there details of over-subscription criteria? Is the school's admission number clear (PAN) Are admission arrangements for disabled students published? Is the mid-year application information and process clear? | In Information / Admissions. This was a little confusing initially as the link goes to About Us / Policies, Documents, Procedures. But if you scroll down you can see the Admissions Policies. The policies were available for 21/22, 22/23 and 23/24 for 6th form and Years 7-11. The Admission Policy 6th Form 22/23 was reviewed. There is further information about 6th form admissions in the 'Sixth Form' menu heading with a link to the online application form. The prospectus is also here (which is referred to in the policy). **We recommend putting a link to the Admission Policy in the Sixth Form section**. The Admission Policy for Years 7-11 for 22/23 was also reviewed. All information was available apart from we couldn't see admission arrangements for disabled students in either policy or in the 'Sixth Form' menu heading. NOTE – we later found this in 'Policy on supporting children with medical conditions at school'. **We recommend links are made with this policy and admission arrangements.** | | | 3 |

| L | WEBSITE TO ENSURE COMPLIANCE | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
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| L4 | Are exclusion arrangements on the website?  Is the Exclusion Policy available? | In About Us/ Policies, Documents, Procedures there is an 'Exclusion for schools' document issued by DFE September 2017.<br><br>**We recommend the Exclusion Policy is made available on the website.** | | | 3 |
| L5 | Is the behaviour policy and anti-bullying strategy available for both staff and students? | In About Us/ Policies, Documents, Procedures there is a Behaviour Policy for pupils, next review date July 2022.<br><br>In About Us/ Policies, Documents, Procedures there is a Staff Behaviour/Code of Conduct policy, this was due for review in October 2021.  There is a section on Bullying and harassment and further reference to a Bullying and Harassment policy.<br>**We recommend this policy is reviewed and updated.** | | | 4 |
| L6 | Academies must publish a report on their policy for pupils and students with SEN and how they put this into effect. This should be updated annually or throughout the year if there are changes. | In About Us/ Policies, Documents, Procedures there is a SEND policy.<br>In About Us/SEND is the SEND Information Report but this isn't dated.<br>**We recommend publishing a date when the report is updated.**<br>**We also recommend considering putting a link (SEND Information Report) under the SEND Policy for clarity.** | | | 3 |
| L7 | Is the Accessibility Plan published and up to date? | In About Us/ Policies, Documents, Procedures there is an Accessibility Plan 2019, due for review July 22. | | | 5 |

| L | WEBSITE TO ENSURE COMPLIANCE | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
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| L8 | Is the latest Ofsted report published, or is there a link to the latest Ofsted report? | In About Us/ Ofsted there is a link to the latest Ofsted report in October 2021. In this section there are also a lot of other links including admissions, school contact details, curriculum etc. **We recommend this is reviewed so that just the ofsted links are in the Ofsted menu heading.** | | | 3 |
| L9 | Pupils progress data should be published with a link to the school and college performance tables (www.compare-school-performance.service.gov.uk) | In About Us/ Performance there is a link to the performance tables which worked on the day of the audit. Other pupil data is also published in this area. | | | 5 |
| L10 | Academies should publish the content of the curriculum in each academic year for every subject. | This is all published in Information / Curriculum. All the links we checked on the day of the audit worked. | | | 5 |
| L11 | Has the academy published information about their remote education provision in accordance with The Education (Coronavirus, Remote Education Information) (England) (Amendment) Regulations 2021 which came into force on 12 February 2021? This provides updates to the existing legislative requirements for schools to publish details about their in-school curriculum so that there is now also a requirement for them to publish details of their remote education provision. | This is published in Community / Covid 19 / Remote Education Provision: Information for parents. | | | 5 |

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| L12 | From September 2018 academies are required to publish information about the school's career programmes. | This is published in Information / Careers. All links worked that we checked on the day of the audit. | | | 5 |
| L13 | As public bodies academies must publish how they comply with the public sector equality duty. This should be updated at least once every 4 years. | In About Us/ Policies, Documents, Procedures there is an Equality Policy, approved December 2021, due for review September 2022. | | | 5 |
| L14 | In accordance with AFH 2020 (2.50) the trust must publish on its website up-to-date details of its governance arrangements in a readily accessible format.<br>Do the directors listed agree with those listed on *Companies House* and *Get Information About Schools (GIAS)*? | The members and trustees were published on the website in About Us /Trustees.<br><br>All agreed with *Companies House* and *GIAS* except Paul Hindle wasn't listed on Companies House.<br><br>**We recommend Paul Hindle is entered on Companies House.** | | | 4 |
| L15 | In accordance with AFH 2020 (5.47) trusts must publish on their website relevant business and pecuniary interests of members, trustees, local governors and accounting officers. Check when this was last reviewed, is it up to date? | In About Us / Trustees. The heading is for Interests in 21-22 so it is up to date for this academic year. It is not clear if it has been updated throughout the year.<br><br>**We recommend a published date is included so it is clear if the document is updated throughout the year.** | | | 4 |

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| L16 | Are the following funding grants published:-<br>• Pupil Premium<br>• Year 7 Literacy and Numeracy<br>Are the reports up to date and do they detail how the funding was spent and the impact? | The Pupil Premium report and information is available in About Us/Pupil Premium.  The report was up to date for 20/21.<br>The Year 7 Literacy and Numeracy Catch Up Premium was available in About Us.  The report was for 19/20 which is the last year the funding was available. | | | 5 |
| L17 | Are dates for governor meetings, minutes and updates available? (ATH2021 2.51) | We couldn't see this information on the website.<br><br>**We recommend all this information is clearly displayed on the website ASAP (we feel that wording such as "Copies of agendas and minutes are available upon request by contacting the Clerk to Governors – with contact details" fully satisfies this requirement).** | | | 3 |
| L18 | If the school gets the coronavirus catch-up premium grant for 20-21 it should publish details on how the grant will be spent.  Does this include how the effect of this expenditure on the educational attainment of those pupils will be assessed? | Published in Community / Covid 19 / Coronavirus (Covid-19) Catch-Up Premium.  It was up to date and included the relevant detail. | | | 5 |

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| L19 | In accordance with AFH 2020 (4.4) are the audited reports and account published on the website?  Note date of the latest accounts. | In About Us / Policies, Documents and Procedures / Financial Documents.<br>The accounts published were up to date and the link worked.<br><br>**We recommend this section is tidied up a little bit – for example the year end accounts should be published as Annual Report and Financial Statement from 2018 onwards to be consistent with 2013-17 – it would just make it easier to navigate and understand.** | | | 4 |
| L20 | Has the Trust published the number of employees whose benefits exceeded £100k, in £10k bandings (extracted from the disclosure in the financial statements from the previous year ended 31 August) as per ATH2020 (2.32)? | In About Us / Policies, Documents and Procedures / Financial Documents.<br>It was published for year ending August 2019 but we couldn't see where 2020 and 2021 were published.<br><br>**We recommend this is updated and published for the current year.** | | | 3 |
| L21 | If a MAT is the MAT Structure published? Are there details about each member academy. | N/A – standalone academy | | | N/A |
| L22 | If a MAT, are there links to each member academy's website?<br>Do these links work? | N/A | | | N/A |

| L | WEBSITE TO ENSURE COMPLIANCE | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
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| L23 | Are the following policies available:-<br>• Complaints policy<br>• Whistle Blowing policy | There is a Serial, Persistent, Vexatious or Unreasonable Complaints Policy in About Us / Policies, Documents and Procedures. It was due for review in April 2022.<br><br>There is also a Complaints Procedure in the same area – this was due for review in February 2022. This procedure refers to a Complaints Policy which we couldn't see on the website.<br><br>**We recommend the Complaints Policy is also made available on the website. We also recommend the policies are reviewed and are up to date.**<br><br>There is a Whistleblowing Policy in In About Us / Policies, Documents and Procedures which was up to date. **We recommend this policy is reviewed to ensure compliance with ATH 2.45 (the trust should appoint one trustee and one member of staff who other staff can contact to report concerns).** | | | 3 |
| L24 | Has the academy published the charging and remissions policy and does it include sufficient details about circumstances where exceptions on a payment would normally be made? | In About Us / Policies, Documents and Procedures. It includes the necessary details and is up to date. It is listed as a DRAFT policy on the website which we assume is incorrect as it has been approved.<br><br>**We recommend the policy is published without reference to being a DRAFT policy.** | | | 4 |

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| | **The following are not required but may enhance the content of the school website:-** | | | | |
| L25 | Is there a location map with directions and advice about parking? | There is a location map at the bottom of the front page.<br><br>**We thought this might be more useful in the Contact Us section with advice about parking.** | | | 4 |
| L26 | Are there any links that might be considered helpful for parents – for example DfE homepage? | In Community / Support there are a number of useful links for parents.  The link for Foodbank Extra didn't work – all other links worked.<br><br>**We recommend the Foodbank Extra link is fixed.** | | | 4 |
| L27 | Are there any links to educational sites, after school clubs, extra curricular activities or emotional support websites for pupils? | In Information / Extra Curricular activities there is a wide selection of extracurricular activities for pupils. There is a Mental Health section in Community but this is currently under maintenance.<br><br>**We recommend the Mental Health section of the website is made available.** | | | 4 |
| 5<br>L28 | Are letters for parents available on the website?  Uniform information, lunch menu, PTA, parent feedback etc? | There are some letters available in News and Events / Latest News but not a specific section.  The news was up to date.<br>All other information is available in the menu option Information – all links worked that we tested on the day of the audit. | | | 5 |

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| L29 | Are the term dates and times of the school day clear?  Are there are school newsletters or school news posts? | I could find term dates using the search option which indicated they were in News and Events.  But when I went directly into News and Events I couldn't find them. **We recommend accessing the term dates document is reviewed.** There is a News and Events menu option which was up to date. **We recommend the newsletters are posted on the website in date order for ease.** | | | 4 |
| | **After reviewing the statutory and additional information on the website comments comment on the following:-** | | | | |

| L | WEBSITE TO ENSURE COMPLIANCE | COMMENTS | 17 Nov 21 | 20 Jun 22 | 20 Jun 22 |
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| L30 | Appraise the general presentation of the website<br><br>How easy is the website to navigate? Were headings for menu sections relevant and appropriate?<br><br>Were font size, text size and heading styles consistent and appropriate throughout? | On the front page of the website at the bottom there is an option to 'Contact Us' highlighted in red.  On the next page there is a 'Choose who to contact' – click to expand. This displays a list of all staff you can contact. I selected Mrs A Duckers – this then took me to an Enquiry Form and one of the prompts included 'Who is your enquiry for?' and you have to go through all the staff to re-select Mrs A Duckers.  This is not so clear and more difficult to navigate.<br>If you go to the 'Contact Us' menu option at the top right of the website you go directly to the Enquiry Form and this misses the list of staff you can contact (which was laid out really clearly).<br>We felt if the 'Choose who to contact' click to expand option went directly to the message without the need to re-select who the enquiry was for this would be better.  Also if the 'Contact Us' went to the 'Choose who to contact' click to expand again without the need to re-select this would be easier for stakeholders to use.<br><br>**We recommend this is reviewed.**<br><br>The Covid option in Community was not fully visible on an IPad.<br>The search function worked well.<br>Font size, text size and headings appeared consistent throughout. |  |  | 3 |

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| L31 | Was there any out of date information? Were news sections up to date? | Everything was mainly up to date unless mentioned elsewhere in this report.  Newsletters and latest news were up to date. | | | 5 |
| L32 | Did links to external websites work? | Links to external websites worked unless mentioned elsewhere in this report.  We didn't come across any other links that didn't work during our internal audit. | | | 5 |
| L33 | Does the website appear secure?  Is there a cookies warning? | The website appears to be secure.  There is a cookies warning and it asks if you accept or deny. | | | 5 |